

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:

**Renergy, Inc.
461 OH-61
Marengo, Ohio 43334**

ATTENTION:

**Cari Oberfield
Chief Operating Officer
cdoberfield@renergy.com**

Request to Provide Information Pursuant to the Clean Air Act

The U.S. Environmental Protection Agency is requiring Renergy, Inc. (Renergy or you) to submit certain information about the facilities at 1156 Herr Road, Fairborn, Ohio (Dovetail), 2279 County Road 156, Cardington, Ohio (Emerald), and 2133 Township Road 224, Ashley, Ohio (Steamtown). Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the information that you must submit. You must send this information to us within 30 calendar days after you receive this request.

We are issuing this information request under Section 114(a) of the Clean Air Act (the CAA), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Enforcement and Compliance Assurance Division, Region 5.

Renergy owns and operates an anaerobic digester with a flare and a spark ignition internal combustion engine at both its Fairborn, Ohio and Cardington, Ohio facilities. We are requesting this information to determine whether you are complying with your federally

enforceable Permits-to-Install and Operate Numbers P0124072 and P0127783 for Dovetail and P0125003 for Emerald, and with federal air pollution control laws at Steamtown.

At this time, EPA Region 5 is not accepting any hard-copy document deliveries. If possible, we ask Renergy to upload all required information to the secured web-link shared with you at the time you received this request. If you did not receive a web-link, or if you are having technical difficulties, you must contact Natalie Schulz at schulz.natalie@epa.gov or 312-886-2776 to make arrangements to submit your response.

Renergy must submit all required information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1519.

You may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice.

This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

We may use any information submitted in response to this request in an administrative, civil or criminal action.

Failure to comply fully with this information request may subject Renenergy to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to Natalie Schulz at 312-886-2776 or schulz.natalie@epa.gov.

Michael D. Harris
Division Director
Enforcement and Compliance Assurance
Division

Appendix A

When providing the information requested in Appendix B, use the following instructions and definitions.

Instructions

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B.
2. Precede each answer with the number of the question to which it corresponds and, at the end of each answer, identify the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.
3. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.
6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.

Electronic Submissions

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for “image over text” to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.

3. Provide submission to the secure web-link provided by EPA.
4. Provide a table of contents of all electronic documents submitted in response to our request so that each document can be accurately identified in relation to your response to a specific question. We recommend the use of electronic file folders organized by question number and by facility.
5. Please submit documents claimed as confidential business information (CBI) in separate file folders apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

Definitions

All terms used in this information request have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 *et seq.*, or National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (NESHAP Subpart ZZZZ) and Standards of Performance for Stationary Spark Ignition Internal Combustion Engines (NSPS Subpart JJJJ).

1. “MMSCF” means millions of standard cubic feet.
2. “Btu/scf” means British thermal unit per standard cubic foot.

Appendix B

Information You Are Required to Submit to EPA

Renergy must submit the following information pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a).

1. Provide a description of the relationship between Renergy and Quasar Energy Group.
2. Provide all air permits in effect for Dovetail, Emerald, and Steamtown at any point during the past five years.
3. Provide a description of the operations at the Steamtown facility, including a list of all air emission units at the facility.
4. For each day beginning on January 1, 2016, until the date of your receipt of this request, list the periods of time (including the date, start time, and end time) that the anaerobic digesters at both Dovetail and Emerald were operating, in Microsoft Excel or other

compatible format. In the same document, delineate when the digester was venting to the engine and when the digester was venting to the flare.

5. Provide a list of all air enforcement actions related to Dovetail, Emerald, and Steamtown taken by any state or local regulatory agency, from January 1, 2016, to the present. Include copies of any air related administrative or judicial complaints; any notices of violation or notices of non-compliance; any documents resolving any alleged violations, such as consent decrees or consent orders; and any orders, such as administrative orders.
6. Provide a description of Dovetail's, Emerald's, and Steamtown's protocols when it receives a community complaint, or a certain number of community complaints.
7. Provide a list of which, if any, state or federal air regulations apply to each sludge lagoon at Dovetail, Emerald, and Steamtown. Additionally, provide an explanation of company policy for controlling emissions or odors from the lagoons.
8. Provide a list of which, if any, state or federal air regulations apply to each tank at Dovetail, Emerald, and Steamtown including, but not limited to, storage tanks and holding tanks. Additionally, provide an explanation of company policy for controlling emissions or odors from the tanks.

Items 9 through 18 are regarding emission units B001 at Dovetail and B003 at Emerald:

9. Provide the operations logs required by Dovetail Permit P0127783 C.1.d)(1), Emerald Permit P0125003 C.1.d)(1), or comparable conditions contained in any preceding air permits for the past three years.
10. Provide the records of fuel burned other than natural gas and digester gas required by Dovetail Permit P0127783 C.1.d)(2), Emerald Permit P0125003 C.1.d)(2), or comparable conditions in any preceding air permits for the past three years.
11. Provide the monthly records of the natural gas and digester gas fuel usage in MMSCF required by Dovetail Permit P0127783 C.1.d)(3), Emerald Permit P0125003 C.1.d)(3), or comparable conditions in any preceding air permits for the past three years.
12. Provide the following information with regard to Dovetail Permit P0127783 C.1.d)(6), Emerald Permit P0125003 C.1.d)(5), or comparable conditions in any preceding air permits for the past three years:
 - a. Identify the Option you have elected for monitoring and recording the hydrogen sulfide concentrations;
 - i. If Option 1, provide the make and model of the gas detector tube or portable gas monitoring meter used and the associated manufacturer's instructions; or,

- ii. If Option 2, provide the make and model of the continuous digester gas monitoring system and the associated manufacturer's operating manual.
 - b. Provide the records of hydrogen sulfide concentration exceedances and the records of corrective actions taken
13. Provide the monthly records of the heat content of the digester gas in Btu/scf required by Dovetail Permit P0127783 C.1.d)(7), Emerald Permit P0125003 C.1.d)(4), or comparable conditions in any preceding air permits for the past three years.
 14. Provide the annual permit evaluation report required by Dovetail Permit P0127783 C.1.e)(2), Emerald Permit P0125003 C.1.e)(2), or comparable conditions in any preceding air permits for the past three years.
 15. Provide all reports submitted or records maintained by Renergy as required by NSPS Subpart JJJJ at 40 C.F.R. § 60.4245(a), Dovetail Permit P0127783 C.1.d)(4), Emerald Permit P0125003 C.1.d)(6), or comparable conditions in any preceding air permits for the past three years.
 16. Provide the results of the most recent performance tests required by Dovetail Permit P0127783 C.1.f)(2), Emerald Permit P0125003 C.1.f)(2), or comparable conditions in any preceding air permits. Provide an explanation of how the most recent performance tests meet the requirements in 40 C.F.R. § 60.8 and the conditions that are specified by Table 2 of NSPS Subpart JJJJ.
 17. Provide a list of all the test methods and equations the Dovetail and Emerald facilities use to demonstrate compliance with the allowable mass emission rates and limitations in the Dovetail Permit P0127783 C.1.f)(1)a.-f. and the Emerald Permit P0125003 C.1.f)(1)a.-d.
 18. Provide all reports submitted or records maintained by Renergy as required by NESHAP Subpart ZZZZ at 40 C.F.R. § 63.6650 for the past three years.

Items 19 through 26 are regarding emission units P001 at Dovetail and P001 at Emerald:

19. State the following:
 - a. Flare manufacturer and model
 - b. Flare diameter
 - c. Flare installation date
 - d. Whether the flare is unassisted, steam-assisted, or air-assisted
20. For each day beginning on January 1, 2016, until the date of your receipt of this request, list the periods of time (date, start time, and end time) that Digester Gas was routed to the flare at the facility (i.e., "venting periods"), in Microsoft Excel or other compatible format.

21. For each venting period listed in response to item 20 above, provide the average mass flow rate of the Vent Gas, in lb/hr, that was vented to each facility flare in Microsoft Excel or other compatible format. The averaging time shall be no more than one hour. If the mass flow rate is not measured, you shall use the best means available to estimate it. Provide a narrative explanation and example calculations, if appropriate, describing how you arrived at your response.
22. Provide the records for the volume of digester gas flared in standard cubic feet per year, and the annual heat input to the flare in million Btu, required by Dovetail Permit P0124072 C.2.d)(4), Emerald Permit P0125003 C.2.d)(4), or comparable provisions in any preceding air permits, for the shorter of the past five years or from the date operation of the flare commenced through the date of your receipt of this request.
23. For each venting period listed in response to item 20 above, provide the average net heating value, in Btu/scf, of the Vent Gas combusted at each flare in Microsoft Excel or other compatible format. The averaging time shall not be greater than one hour. If the heating value is not measured, you shall use the best means available to measure it for two weeks, commencing five days after receipt of this letter. Provide a narrative explanation and example calculations, if appropriate, describing how you arrived at your response.
24. Provide the monthly records of the heat content of the digester gas, in Btu/scf, required by Dovetail Permit P0124072 C.2.d)(2), Emerald Permit P0125003 C.2.d)(2), or comparable provisions in any preceding air permits, for the shorter of the past five years or from the date operation of the flare commenced through the date of your receipt of this request.
25. Provide the following information with regard to Dovetail Permit P0124072 C.2.d)(1), Emerald Permit P0125003 C.2.d)(1), or comparable provisions in any preceding air permits:
 - a. Identify the Option you have elected for monitoring and recording the hydrogen sulfide concentrations;
 - i. If Option 1, provide the make and model of the gas detector tube or portable gas monitoring meter used and the associated manufacturer's instructions; or,
 - ii. If Option 2, provide the make and model of the continuous digester gas monitoring system and the associated manufacturer's operating manual.
 - b. Provide the weekly or continuous hydrogen sulfide concentrations at the flare emissions units, in ppm, for the time period of January 1, 2016 until the date of your receipt of this request.
 - c. Provide the records of hydrogen sulfide concentration exceedances and the records of corrective actions taken for the past three years.

26. Provide copies of the last five years of annual permit evaluation reports (PER) required by Dovetail Permit P0124072 C.2.e)(2), Emerald Permit P0125003 C.2.e)(2), or comparable provisions in any preceding air permits.